

Distribution

Unit Managers' Meeting: 300 Areas Remedial Action Unit/Source Operable Units

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Please inform Michael Wetzler (372-9562) – BHI (H0-17)
of deletions or additions to the distribution list.

Meeting Minutes Transmittal/Approval
300 Area Unit Managers' Meeting
Remedial Action and Waste Disposal Unit/Source Operable Unit
3350 George Washington Way, Richland, Washington
April 2002

APPROVAL: Robert G. McLeod Date 6-20-02
Robert G. McLeod, 300-FF- 1 & 300-FF-2 Area Unit Managers, RL (A3-04)

APPROVAL: Kevin D. Leary Date 6-20-02
Kevin Leary, 618-10 & 618-11 Area Unit Manager, RL (A6-38)

APPROVAL: M. Michael Thompson Date 7/30/02
Mike Thompson, 300-FF-5 Area Unit Manager, RL (A5-13)

APPROVAL: John B. Price Date 7/11/02
John B. Price, Cleanup Project Manager, WDOE (B5-18)

APPROVAL: Mike L. Goldstein Date 6/19/02
Mike L. Goldstein, 300 Aggregate Area Unit Manager, EPA (B5-01)

Meeting minutes are attached. Minutes are comprised of the following:

Attachment 1	--	Agenda
Attachment 2	--	Attendance Record
Attachment 3	--	300 Area Meeting Minutes – April 16, 2002
Attachment 4	--	Previous Open Action Items List
Attachment 5	--	Letters from the Oregon Department of Energy

Prepared by:


Jenifer Linville/ Michael Wetzler (H0-17)

Date

7/3/02

Concurrence by:


Vern Dronen, Project Manager

Date

8/1/02

BHI Remedial Action and Waste Disposal Project (H0-17)

UNIT MANAGERS MEETING AGENDA

3350 GWW 1B45

April 16, 2002, 1:30-3:30 p.m.

300 Area

Administrative (1:30 – 2:00)

- Action Item List
- Next UMM is May 21, 2002, 1:30 – 3:30, 3350 GWW (1B45)

Crossover Items (These items will be discussed at next 100UMM)

- *Site Wide Institutional Controls Plan*
- *TPA Milestone Negotiations (M-16-00B)*

300-FF-1 Remedial Action (2:00 – 2:30)

- 618-4 Mobilization Status
- Drum Treatment Technologies
- Spill Reporting

300-FF-2 (2:30 – 3:00)

- 618-11 Benchmarking
- Outside The Fence Design
- RDR/RAWP/SAP
- Kd/Leach Study

300-FF-5 (3:00 – 3:30)

- 300-FF-5 O&M Plan / SAP
- 300 Area Shoreline Study

Meeting Minutes Schedule

- Draft – 1 week
- Distribute – 1 Day
- Review – 1 week
- Incorporate – 1 week
- Finalize – Next UMM

Remedial Action and Waste Disposal Unit Managers' Meeting
Official Attendance Record - 300 Area
April 16, 2002

Please print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
ANDREW ROGERS	BHI	300 FF 1/2	3-5445
Bob McLeod	DOE	Unit Manager	372-0096
Ellen Coenenburg	CHI	300 FF 2	2-9140
Richard Carlson	BHI	300-FF-2	2-9632
Larry Hulstrom	CHI	300 FF 2	2-9602
Mike Goldstein	EPA	300-FF-2	376-4919
Jon YERXA	DOE	TPA	376-9628
Frank Conrath	BHI	300 FF 1/2	531-0625
Jeff Lerch	CHI	300 FF-1/2	373-5904
K Michael Thompson	DOE-RL	GLT	373-0750
FRED ROECK	BHI	PEL	372-9565
Alex Termoneri	DOE / RL-RIA	TPA	376-6222
Pam Doctore	BHI	RISK	372-9107
Jessica Kiowis	BHI	RISK	372-9524
Bryan Foley	DOE-RL	618-10/11	376-7087
Ted Porton	PNNL		376-5878
Greg Patton	PNNL		376-2027
Ken Gano	BHI		372-9316
ROGER DIRKES	PNNL		376-8177
Janice Zecoboff	RL/DOE		372-0108

**MEETING MINUTES
REMEDIAL ACTION AND WASTE DISPOSAL
UNIT MANAGER'S - 300 AREA
3350 GWW CR 1B45, 1:30 – 3:30 p.m.
April 16, 2002**

ADMINISTRATIVE

Review of Open Action Item List: (Attachment 4)

- No changes or additions were made to the Action Items.

The next UMM is May 14, 2002, 1:30-3:30, 3350 GWW 1B45.

CROSSOVER ITEMS FROM 100 AREA UMM

- **Site Wide Institutional Controls Plan:** Jim Daily is collecting comments. Ella Coenenberg (ERC) has an action to determine if ERC comments were incorporated.
- **TPA Milestone Negotiations (M-16-00B):** Comment resolutions are scheduled to be completed by April 30 and then issued. DOE/RL will continue to provide updates to ERC staff. Mike Goldstein (EPA) indicated that a copy of the draft responses should be available by the end of the week (April 16).

300-FF-1

- **618-4 Mobilization Status:** The Readiness Review held this morning went well. RL/EPA managers concurred with the ERC project manager to proceed with startup. RL/EPA requested a copy of the handouts from the readiness meeting.
- **Drum Treatment Technologies:** The revised document is nearing completion and then will be published (Rich Carlson action). Requirements on treatment options should be available in a couple of weeks.
- **Spill Reporting:** The review of the white paper by Mike Goldstein has yet to be completed.

300-FF-2

- **618-11 Benchmarking:** The next meeting is tomorrow morning (April 16) at 8:00 AM (status meeting). It was noted that the team needs to evaluate the value of continuing these benchmarking calls, perhaps to change the frequency and to include staff from FH.

- **Outside the Fence Design:** Comments from the internal review were being incorporated.
- **RDR/RAWP/SAP:** A meeting is scheduled following the UMM to discuss comments received thus far. Two issues have been identified. The use of composite sampling is one issue that will need further discussion with Ecology. The second issue concerns use of the new MTCA terrestrial ecological evaluation procedures. Discussions are being held with RL/BHI Regulatory and Legal staff and the proposed response will be provided to EPA. It was also noted that comments on the draft redline documents were overdue from EPA.
- **Kd Leach Study:** Lab work is on schedule (revised scope/schedule Jan 2002). A draft report is due in mid August. A briefing will be held when more data are available.
- **Uranium Conceptual Site Model:** The BCP was approved to allow work to begin. The South Process Pond will be used as a test of the model. Concurrence on parameters that will be used for the RESRAD model runs is needed from RL and EPA. Further discussions with the regulators will take place after the initial runs are completed and analyzed. A meeting in early May with RL and EPA was suggested.

300-FF-5

- **300-FF-5 O&M Plan/SAP:** The SAP is nearing completion of the RL approval cycle. The O&M Plan is ready for EPA approval.

Two letters from the Oregon Department of Energy regarding the 618-11 burial ground were discussed. Both EPA and RL are working on responses to the letters.

- **300 Area Shoreline Study:** Ted Poston of PNNL provided a status report on the results of the shoreline sampling that was conducted in conjunction with the Department of Health. A draft report summarizing the shoreline results is being prepared as a joint PNNL and DOH effort. Preliminary results have been factored into the 300-FF-5 O&M Plan and SAP to direct future sampling efforts.

300 Area Unit Manager Meeting Action Items Log

Ted Posten Presentation on current Shoreline Study for April UMM	Mike Thompson	April UMM	03/19/2002	04/16/2002		
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Oregon

John A. Kitzhaber, M.D., Governor



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April 9, 2002

Mr. K. Michael Thompson
U.S Department Of Energy
P.O. Box 550 MS A5-13
Richland, WA 99352

Subject: Letter 02-GWVZ-007, John Morse to Douglas Sherwood re: Action Item 300-3 of the Comprehensive Environmental Response, Compensation, and Liability Act Five-Year Review.

Mike
Dear Mr. Thompson,

The Oregon Office of Energy has reviewed the information supplied in the response to Action Item 300-3 of the CERCLA five-year review and has the following comments for your consideration.

1. The document contains no assessment of any potential causes for the sudden and large jump in tritium concentrations emanating from the 618-11 burial ground, nor does it contain any estimates of the likelihood that this event may recur. These parameters would seem to be critically important in determining the schedule for remediating the 618-11 burial ground.
2. The report comments that the high Helium-3 to Helium-4 ratios along the north edge of the burial ground are due to a vadose zone source. There is no discussion as to implications of this source for the groundwater.
3. The document states that the modeling results which best fit the observed plume geometry indicate a realistic contaminant travel time of 70 to 80 years from the burial ground to the river. Yet, the document also indicates in several places that the plume has traveled about 3100 feet in three and a half years. Simple arithmetic gives a travel time of about 21 years to the river from this data. This apparent discrepancy needs to be explained.
4. Attachment 2, page 7, implies that rapid travel times are not consistent with the narrowness of the plume, and the low concentrations seen at boring C3256. However, a narrow plume would be consistent with a rapidly moving plume since the more rapid the plume movement the less time there would be for horizontal dispersion. And, the inconsistencies cited in the report with respect to boring C3256 concentrations would be consistent with the passage of one plume and the arrival of a second. In other words, the 20-year-old plume mentioned is gone and the plume that started in 1999 is now arriving. This possibility also seems to fit well with the "back of the envelope" calculated travel time of 21 years from the burial ground to the river mentioned in comment 3 above. This scenario should be evaluated.

Should you have any questions, please feel free to contact me at (503)378-4456.

Sincerely,

Doug
Douglas S. Huston
Nuclear Safety Technical Specialist
Oregon Office of Energy

Cc: Mr. David Einan - EPA

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April 9, 2002

Dave Einan
Acting Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, WA 99352

Dear Mr. Einan:

The U.S. Department of Energy (DOE) has concluded that the 618-11 burial ground currently poses little health or environmental risk and that annual monitoring is sufficient to track the tritium plume leaking from this burial ground (Letter 02-GWVZ-007, John Morse to Douglas Sherwood: Action Item 300-3 of the CERCLA Five Year Review and supporting documents). Given that it has been only slightly more than two years since we all became aware of problems related to the 618-11 burial ground, we are not yet convinced that enough is known to definitively state that there is no longer reason for concern.

First and foremost, we still do not know the source of the tritium from within the burial ground. Given that we don't know the source of the tritium, other assumptions about the contents of the burial ground are just that – assumptions. We do not, for example, know whether we will have other releases from the burial ground, perhaps involving even higher levels of tritium or some other longer-lived radionuclides. Despite the efforts to model the spread of the plume, we do not know with any level of certainty how long it will take for the current tritium plume to reach the Columbia River, nor what impacts it may have when it does.

Because of these concerns, we request the Environmental Protection Agency require DOE to do the following:

- Continue efforts to more fully identify the contents of the burial ground through a document search.
- Explore potential technology and methods to obtain samples from within the burial ground.
- Conduct groundwater sampling on a quarterly basis – rather than an annual basis – in the vicinity of the burial ground, for at least the next three years, to ensure that the assumptions DOE is making about the existing plume are verified by monitoring data, and that no new plumes are allowed to spread for as long as a year without knowledge of the event.

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DOE RL/CCC


April 9, 2002

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We also request that EPA reconsider whether an improved cap is necessary for the burial ground, given that remediation is not expected to begin for more than a decade and that the existing cover material is roughly equivalent only to a RCRA "D" cover.

We appreciate your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Niles", written in a cursive style.

Ken Niles, Administrator
Nuclear Safety Division

c.c. ~~John Morse, DOE~~
Mike Wilson, Ecology
Todd Martin, Hanford Advisory Board